

FILED 07 NOV '13 15:02 USDC-ORP

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNDER SEAL**

**UNITED STATES OF AMERICA**

**3:13-CR- 00532-MO**

**v.**

**INDICTMENT**

**SHANE JACK;  
LONDON BRITT;  
GEORGIA JACK;  
BRANDON LYONS;  
RONALD STOLTENBERG;  
JAMES LONGORIA, JR.;  
MATTHEW BOWEN;  
CHRISTOPHER BOWDEN;  
DOUG ERICKSON;  
REBECCA ERICKSON;  
TRAVIS MONTEITH;  
GERMAN MARTIN MCCUBBIN;  
BRADLEY HOLLIBAUGH;  
ALI SHAGHAGHI;  
BENJAMIN LUCK;  
KEITH KOFOED;**

**[18 U.S.C. §§ 924(c)(1)(A) and (d);  
§§ 982 (a)(1) and (b)(1);  
§§ 1956 (a)(2)(A) and (h);  
21 U.S.C. §§ 841 (a)(1); (b)(1)(C),  
(b)(1)(D), (b)(1)(E); § 843 (b); § 846;  
§ 853; § 856;  
§ 963  
28 U.S.C. § 2461(c)]**

**UNDER SEAL**

**Defendants.**

**THE GRAND JURY CHARGES:**

**COUNT 1  
[CONSPIRACY]**

**I. INTRODUCTION.**

At various times material to this Indictment:

**A. THE DEFENDANTS.**

1. **SHANE JACK**, was a resident of the state and District of Oregon from before January 2008 to the date of this Indictment. According to an Amended Annual Report filed by defendant **LONDON BRITT** with the State of Oregon Secretary of State, **SHANE JACK**, of

8116 SE Duke Street, Portland, Oregon 97206, is the Registered Agent and President of SJ Motors, Inc., a Domestic Business Corporation. Defendant **SHANE JACK** holds and controls four bank accounts: (1) Bank of America, Business Economy Checking Account Number xxxxxx6366, in name of Shane R. Jack dba SJ Motors, Inc.; (2) Wells Fargo Bank, Custom Management Checking Account Number xxx-xxx 6434, in name of Shane R. Jack; (3) Bank of America, Regular Checking Account Number xxxx xxxx 9933, in name of Shane R. Jack; (4) US Bank, Silver Elite Checking Account Number x xxx xxxx 5548, in name of Shane R. Jack and Bud F. Jack. Defendant **SHANE JACK** is married to defendant **GEORGIA JACK**, and as of the date of this Indictment, resides with her at 8116 SE Duke Street, Portland, Oregon. Defendant **SHANE JACK** is the father of S.H., who resides in Idaho Falls, Idaho.

2. Defendant **LANDON BRITT** was a resident of the state and District of Oregon from before January 2008 to the date of this Indictment. According to an Amended Annual Report, filed by defendant **LANDON BRITT** with the State of Oregon Secretary of State, **LANDON BRITT** of 12523 SE Harold Street, Portland, Oregon, is the Secretary of SJ Motors, Inc. Defendant **LANDON BRITT** holds and controls three bank accounts: (1) J.P. Morgan Chase, Chase Business Select Checking Account Number xxxxx 2204, in name of SJ Motors Inc. (held by Landon Britt); (2) Bank of America, My Access Checking Account Number xxxx 5659, in name of Landon Britt and Tammi L. Britt; (3) J.P. Morgan Chase, Chase Premier Plus Checking Account Number xxx-xxx 4304, in name of Landon Britt. Defendant **LANDON BRITT**, at the time of this indictment, resides at 12523 SE Harold Street, Portland, Oregon, and owns rural property in Selma, Oregon.

3. Defendant **GEORGIA JACK** is married to defendant **SHANE JACK**, and as of the date of this Indictment, resides with him at 8116 SE Duke Street, Portland, Oregon.

4. Defendant **RONALD STOLTENBERG**, at times material to this indictment, was a resident of 518 SE 102nd Avenue, Vancouver, Washington.

5. Defendant **BRANDON LYONS**, at times material to this indictment, was a resident of Portland and Clackamas, Oregon. Defendant **BRANDON LYONS** is the son of defendant **REBECCA ERICKSON** and the step-son of defendant **DOUG ERICKSON**.

6. Defendant **JAMES LONGORIA, JR.**, at times material to this indictment, was a resident of Clackamas, Oregon.

7. Defendant **MATTHEW BOWEN**, at times material to this indictment, was a resident of Tualatin, Oregon.

8. Defendant **CHRISTOPHER BOWDEN**, at times material to this indictment, was a resident of Beaverton, Oregon.

9. Defendant **DOUG ERICKSON**, at times material to this indictment, was a resident of Portland, Oregon, was a step-father to defendant **BRANDON LYONS**, and was married to defendant **REBECCA ERICKSON**.

10. Defendant **REBECCA ERICKSON**, at times material to this indictment, was a resident of Portland, Oregon, was mother to defendant **BRANDON LYONS**, and was married to defendant **DOUG ERICKSON**.

11. Defendant **TRAVIS MONTEITH**, at times material to this indictment, was a resident of Fairview, Oregon.

12. Defendant **GERMAN MARTIN MCCUBBIN**, at times material to this indictment, was a resident of the state of California.

13. Defendant **BRADLEY HOLLIBAUGH**, at times material to this indictment, was a resident of Otis Orchards, Washington.

14. Defendant **ALI SHAGHAGHI**, at times material to this indictment, was a resident of Seattle, Washington.

15. Defendant **BENJAMIN LUCK**, at times material to this indictment, was a resident of the state of California.

16. Defendant **KEITH KOFOED**, at times material to this indictment, was a resident of the states of California and North Carolina.

## **II. OBJECTS OF THE CONSPIRACY.**

Beginning at a time unknown, and continuing thereafter until the date of this Indictment, in the District of Oregon and elsewhere, defendants **SHANE JACK, LONDON BRITT, GEORGIA JACK, BRANDON LYONS, RONALD STOLTENBERG, JAMES LONGORIA, JR., MATTHEW BOWEN, CHRISTOPHER BOWDEN, DOUG ERICKSON, REBECCA ERICKSON, TRAVIS MONTEITH, GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK** and **KEITH KOFOED** did knowingly and intentionally combine, conspire, confederate and agree with each other and with others known and unknown to the grand jury, to commit the following offenses, all in violation of United States Code 21 U.S.C. Sections 846 and 963, to-wit:

**A. Importation of Controlled Substances into the United States:** The conspirators agreed to import anabolic steroids, a Schedule III controlled substance, into the United States, in violation of Title 21, United States Code, Sections 952 (b) and 960;

**B. The Manufacture, Distribution and Possession with Intent Distribute Controlled Substances:** (1) The conspirators agreed to manufacture anabolic steroids (Schedule III); (2) The conspirators agreed to manufacture marijuana (Schedule I); (3) The conspirators agreed to distribute and possess with intent to distribute anabolic steroids (Schedule III); (4) The

conspirators agreed to distribute and possess with intent to distribute marijuana (Schedule I); (5) The conspirators agreed to distribute and possess with intent to distribute Oxycodone (Schedule II); (6) The conspirators agreed to distribute and possess with intent to distribute Hydrocodone (Schedule III); all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), (b)(1)(D) and (b)(1)(E).

**C. Use of a Communication Facility:** The conspirators agreed to use communication facilities, including telephones, in the commission, causing or facilitation of felony offenses related to the importation, manufacturing, distribution and possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 843(b);

**D. Maintaining Drug-Involved Premises:** The conspirators agreed to lease, rent, use or maintain, a place, whether permanently or temporarily, for the purpose of manufacturing, distributing, or using any controlled substance, in violation of Title 21, United States Code, Section 856; and

### **III. MANNER AND MEANS BY WHICH THE CONSPIRACY WAS CARRIED OUT.**

Defendants **SHANE JACK, LONDON BRITT, GEORGIA JACK, BRANDON LYONS, RONALD STOLTENBERG, JAMES LONGORIA, JR., MATTHEW BOWEN, CHRISTOPHER BOWDEN, DOUG ERICKSON, REBECCA ERICKSON, TRAVIS MONTEITH, GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK and KEITH KOFOED**, together with others both known and unknown to the grand jury acting at the defendants' direction, carried out the conspiracy through the following manners and means:



1. It was part of the conspiracy that defendants **SHANE JACK** and **LONDON BRITT** created and registered SJ Motors, Inc. as a Domestic Business Corporation with the State of Oregon, so as to create a front for their drug-trafficking and money laundering activity.

2. It was further a part of the conspiracy that defendants **SHANE JACK, LONDON BRITT** and **BRANDON LYONS** ordered and acquired schedule III controlled substance anabolic steroids from locations outside the United States, namely China.

3. It was further a part of the conspiracy that defendants **LONDON BRITT** and **BRANDON LYONS** made payments to suppliers of anabolic steroids from China by transmitting or transferring monetary instruments or funds from a place in the United States to or through a place outside the United States, namely China or Hong Kong, involving wire transfers or bank swift (international bank) transfers of funds, with the intent to promote their drug trafficking activity.

4. It was further part of the conspiracy that defendants **SHANE JACK, LONDON BRITT, RONALD STOLTENBERG, DOUG ERICKSON, REBECCA ERICKSON** and **MATTHEW BOWEN** were recipients of shipments of anabolic steroids from China.

5. It was further part of the conspiracy that defendants **SHANE JACK, LONDON BRITT** and **GEORGIA JACK** manufactured anabolic steroids by converting powder anabolic steroids into liquid; packaged or bottled liquid anabolic steroids for distribution; labeled liquid anabolic steroids; manufactured or re-labeled tablet form anabolic steroids; packaged or bottled tablet form anabolic steroids for distribution; and, labeled tablet form anabolic steroids.

6. It was further part of the conspiracy that defendants **SHANE JACK, LONDON BRITT** and **GEORGIA JACK** manufactured, packaged, labeled or re-labeled additives to

anabolic steroids such as Human Growth Hormone (HGH), Human Chorionic Gonadotropin (HCG), Arimadex, Viagra and Cialis.

7. It was further part of the conspiracy that defendants **SHANE JACK, LONDON BRITT** and **GEORGIA JACK** labeled anabolic steroids using the "Pharmagen" name, and knew that "Pharmagen" has never been registered with the Drug Enforcement Administration to manufacture or distribute controlled substances.

8. It was further part of the conspiracy that defendants **SHANE JACK, LONDON BRITT** and **GEORGIA JACK** maintained premises or locations, to include Apartment 106, Building L of the Altamont Summit Luxury Apartments, 9701 SE Johnson Creek Boulevard, Happy Valley, Oregon, to manufacture and prepare controlled substance anabolic steroids for distribution.

9. It was further part of the conspiracy that defendants **SHANE JACK** and **LONDON BRITT** used the United States Postal Service, including the post office at 3850 SE 82nd Avenue, Portland, Oregon, to mail and distribute controlled substance anabolic steroids to recipients at locations, including those outside the District and state of Oregon, within the United States.

10. It was further part of the conspiracy that defendants **GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK** and **KEITH KOFOED** received packages containing anabolic steroids, or arranged for others to receive packages containing anabolic steroids, that were mailed by **SHANE JACK** and **LONDON BRITT**.

11. It was further part of the conspiracy that defendants **SHANE JACK, LONDON BRITT, GEORGIA JACK** and **JAMES LONGORIA, JR.** used residences (12523 SE Harold

Street and 8116 SE Duke Street) in Portland, Oregon, to conduct their manufacturing and distribution of marijuana; their importation, manufacturing and distribution of anabolic steroids; and, their distribution of other controlled substances, oxycodone and hydrocodone.

12. It was further part of the conspiracy that defendant **LANDON BRITT** purchased and maintained land and property in Selma, Oregon for the purpose of manufacturing and distributing marijuana.

13. It was further part of the conspiracy that defendants **LANDON BRITT, JAMES LONGORIA, JR.** and **SHANE JACK** coordinated, conducted and organized activity to manufacture marijuana in Oregon and to distribute marijuana to others to locations including those outside the state and District of Oregon.

14. It was part of the conspiracy that defendants **LANDON BRITT** and **JAMES LONGORIA, JR.** used a fifth wheel camper, which **LANDON BRITT** registered with Oregon Department of Motor Vehicles in April 2013, to conduct their illegal manufacturing and distribution of marijuana.

15. It was further part of the conspiracy that defendants **SHANE JACK, LANDON BRITT, GEORGIA JACK, BRANDON LYONS, RONALD STOLTENBERG, JAMES LONGORIA, JR., MATTHEW BOWEN, CHRISTOPHER BOWDEN, REBECCA ERICKSON, TRAVIS MONTEITH, GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK** and **KEITH KOFOED** used telephones to organize, conduct and communicate their drug-trafficking activity.

16. It was further part of the conspiracy that defendants **SHANE JACK; LANDON BRITT; GEORGIA JACK; BRANDON LYONS; RONALD STOLTENBERG; JAMES LONGORIA, JR.; MATTHEW BOWEN; CHRISTOPHER BOWDEN; DOUG**



**ERICKSON; REBECCA ERICKSON and TRAVIS MONTEITH** used motor vehicles to transport controlled substances and to conduct their drug-trafficking activity.

17. It was further part of the conspiracy that defendants **GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK, and KEITH KOFOED** purchased controlled substance anabolic steroids, and other controlled substances from defendants **SHANE JACK** and **LANDON BRITT** and made payment for those purchases by various means, including cash or check deposits into **SHANE JACK's** or **LANDON BRITT's** bank accounts and the mailing of cash, checks or money orders to **SHANE JACK** and **LANDON BRITT**, for eventual deposit.

18. It was further part of the conspiracy that defendants **GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK** and **KEITH KOFOED** re-distributed controlled substance anabolic steroids supplied by **SHANE JACK** and **LANDON BRITT** by various means, including directly re-selling received anabolic steroids and brokering purchases of controlled substance anabolic steroids for their customers.

19. It was further part of the conspiracy that defendants **GERMAN MARTIN MCCUBBIN, MATTHEW BOWEN** and **TRAVIS MONTEITH** supplied and distributed controlled substances, to include anabolic steroids or illegally distributed pharmaceutical controlled substances, such as oxycodone or hydrocodone, to defendants **SHANE JACK, GEORGIA JACK** and **LANDON BRITT**.

20. It was further part of the conspiracy that defendants **SHANE JACK** and **GEORGIA JACK** distributed illegally distributed pharmaceutical controlled substances, such as oxycodone or hydrocodone, to customers for consideration.

21. It was further part of the conspiracy that **SHANE JACK** used the U.S. Postal Service to unlawfully distribute marijuana to a location outside the state and District of Oregon.

22. It was further part of the conspiracy that **SHANE JACK** and **LANDON BRITT** acquired and maintained possession of firearms and ammunition in furtherance of their drug trafficking activity.

#### **IV. OVERT ACTS.**

In furtherance of the conspiracy, the defendants committed the following overt acts, among others:

1-68. On the dates listed below defendants **SHANE JACK**, **LANDON BRITT**, **RONALD STOLTENBERG**, and others on behalf of the conspiracy, received packages containing controlled substances anabolic steroids from China in the following transactions:

<b>Date</b>	<b>Sender</b>	<b>Consignee</b>	<b>Address</b>	<b>Recipient</b>
1/28/2008	SODEXI EXPRESS TEAM	IBE TECHNOLOGY	8116 SE DUKE PORTLAND, OR	Shane JACK
3/14/2008	HANGZHOU HUAGAO INDUSTRY CO LTD	PURETECH RESEARCH INC	518 SE 102ND AVE VANCOUVER WA	Ronald STOLTENBERG
3/18/2008	HANGZHOU HUAGAO INDUSTRY CO LTD	PURETECH RESEARCH INC	518 102 AVE VANCOUVER WA	Ronald STOLTENBERG
3/21/2008	HANGZHOU HUAGAO INDUSTRY CO LTD	PURETECH RESEARCH INC	15905 NE 27TH CIRCLE VANCOUVER WA	N.W.
3/25/2008	HANGZHOU HUAGAO INDUSTRY CO.,LTD	IBE TECHNOLOGY	518 SE 102 ND AVE VANCOUVER WA	Ronald STOLTENBERG
4/1/2008	HANGZHOU HUAGAO INDUSTRY CO.,LTD	PURETECH RESEARCH INC	518 SE 102ND AVE VANCOUVER WA	Ronald STOLTENBERG

4/15/2008	SHANGHAI YUNYUN CHEMICAL COL	IBE TECHNOLOGY INC	518SE 102ND AVE VANCOUVER WA	Ronald STOLTENBERG
4/18/2008	SHANGHAI YUNYUN CHEMICAL COL	IBE TECHNOLOGY INC	15905 NE 27TH CIRCLE VANCOUVER WA	N.W.
5/19/2008	Peter Yang, ACI, FOXCONN HG TECH PARK, NORTH DISTRICT, GUANLAN 518110, CN, SHENZHEN, GD 518110, CN	LANDON BRITT	12523 SE HAROLD ST, PORTLAND, OR	Landon BRITT
6/17/2008	HANGZHOU HUAGAO INDUSTRY CO LTD	IBE TECH	518 SE 102ND AVE VANCOUVER WA	Ronald STOLTENBERG
7/23/2008	HANGZHOU HUAGAO INDUSTRY CO.,LTD	IBE TECHNOLOGY INC	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
7/29/2008	HUAGAO CO.,LTD	IBE TECHNOLOGY INC	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
8/19/2008	SHANGHAI YUN YUN CHEMICAL CO.,LTD	A.L., IBE TECHNOLOGY INC	12523 SE HAROLD ST,PORTLAND, OR 972	Landon BRITT
9/10/2008	SHANGHAI YUNYUN CHEMICAL CO.,LTD	A.L., IBE TECHNOLOGY INC	12523 SE HAROLD ST. PORTLAND OR 972	Landon BRITT
9/23/2008	Peter, SHANGHAI YUN YUN CHEMICAL	A.L., IBE TECHNOLOGY INC	12523 SE HAROLD ST. PORTLAND OR 97236	Landon BRITT
10/28/2008	SHANGHAI YUNYUN CHEMICAL CO.,LTD	IBE TECHNOLOGY INC	2706 L STREET VANCOUVER, WA 98663 U	C.W.
12/19/2008	SHANGHAI YUNYUN CHEMICAL COL	PURETECH RESEARCH INC	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
12/22/2008	SHANGHAI YUNYUN CHEMICAL CO.,L TD. RM 504 NO.2	PURETECH RESEARCH INC,	12523 SE HAROLD ST, PORTLAND, OR 97236	Landon BRITT

	LANE 1568, CHANG JIANG WEST ROAD, BAOSHAN, CN 200431			
1/11/2009	SHANGHAI YUNYUN CHEMICAL COL	IBE TECHNOLOGY INC	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
1/12/2009	SHANGHAI YUNYUN CHEMICAL CO.,L TD. RM 504 NO.2 LANE 1568, CHANG JIANG WEST ROAD, BAOSHAN, CN 200432	IBE TECHNOLOGY INC	12523 SE HAROLD ST, PORTLAND, OR 97236	Landon BRITT
1/25/2009	SHANGHAI YUNYUN CHEMICAL COL	IBE TECHNOLOGY INC	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
2/3/2009	SHANGHAI YUNYUN CHEMICAL CO.,L TD. RM 504 NO.2 LANE 1568, CHANG JIANG WEST ROAD, BAOSHAN, CN 200433	IBE TECHNOLOGY INC,	12523 SE HAROLD ST, PORTLAND, OR 97237	Landon BRITT
2/9/2009	SHANGHAI YUNYUN CHEMICAL CO.,L TD. RM 504 NO.2 LANE 1568, CHANG JIANG WEST ROAD, BAOSHAN, CN 200434	IBE TECHNOLOGY INC,	12523 SE HAROLD ST, PORTLAND, OR 97238	Landon BRITT
5/26/2009	SHANGHAI YUNYUN CHEMICAL COL	IBE TECHNOLOGY INC	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
5/15/2010	SHANGHAI YUNYUN CHEMICAL CO.LTD	MBE TECHNOLOGY	7185 LOS VERDES DR GLADSTONE OR9702	P.M.
6/5/2010	SHANGHAI YUNYUN CHEMICAL CO.LTD	MBE TECHNOLOGY	7185 LOS VERDES DR GLADSTONE OR9702	P.M.

6/22/2010	SHANGHAI YUNYUN CHEMICAL CO.LTD	MBE TECHNOLOGY	7185 LOS VERDES DR GLADSTONE OR9702	P.M.
8/5/2010	SHANGHAI YUNYUN CHEMICAL CO.LTD	MBE TECHNOLOGY	11243 SE STEVENS RD PORTLAND OR97086	P.M.
9/11/2010	SHANGHAI YUNYUN CHEMICAL CO.LTD	MBE TECHNOLOGY	7185 LOS VERDES DR GLADSTONE OR9702	P.M.
10/1/2010	MR WAN	P.M.	11243 SE STEVENS RD PORTLAND OR 970	P.M.
11/3/2010	SHANGHAI YUNYUN CHEMICAL CO.LTD	MBE TECHNOLOGY	11243 SE STEVENS RD PORTLAND OR970	P.M.
11/10/2010	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
1/22/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY CO.LTD	11243 SE STEVENS RD PORTLAND OR970	P.M.
2/15/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	11243 SE STEVENS RD PORTLAND OR970	P.M.
3/24/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
5/7/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
7/28/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG



8/18/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
10/10/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
10/12/2011	NANJING PLASTIC TRADING COMPANY LTD	PAUL MEYEA	11243 SE STEVENS RD PORTLAND OR	P.M.
11/12/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
12/17/2011	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA	Ronald STOLTENBERG
2/4/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
2/8/2012	SHANGHAI YUN YUN HUAGONG CO LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
3/28/2012	YUN YUN HUAGONG CO LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
3/30/2012	SHANGHAI YUNYUN CHEMICLA CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
5/4/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
5/8/2012	SHANGHAI YUNYUN CHEMICAL CO LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
6/30/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG

7/3/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
8/22/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
9/25/2012	SHANGHAI YUNYUN CHEMICAL CO.,LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER	Ronald STOLTENBERG
9/26/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
11/1/2012	SHANGHAI YUNYUN CHEMICAL CO.,LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER	Ronald STOLTENBERG
11/2/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
11/19/2012	SHANGHAI YUNYUN CHEMICAL CO.,LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER	Ronald STOLTENBERG
11/20/2012	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
1/14/2013	SHANGHAI YUNYUN CHEMICAL CO.,LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER	Ronald STOLTENBERG
1/20/2013	4PX EXPRESS, SHENZHEN Co, LTD	Ron STOLTENBERG	518 SE 102ND AVE VANCOUVER	Ron STOLTENBERG
1/31/2013	SHANGHAI YUNYUN CHEMICAL CO.,LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER	Ronald STOLTENBERG
2/2/2013	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG

2/21/2013	MR WAN	Ron STOLTENBERG	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
2/26/2013	SHANGHAI YUNYUN CHEMICAL CO.LTD	Landon BRITT/IBE Technology	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
3/15/2013	SHANGHAI YUNYUN CHEMICAL CO.LTD	Landon BRITT/IBE Technology	12523 SE HAROLD ST PORTLAND OR	Landon BRITT
4/24/2013	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
5/8/2013	SHANGHAI YUNYUN CHEMICAL CO.LTD	IBE TECHNOLOGY INC	518 SE 102ND AVE VANCOUVER WA 98664	Ronald STOLTENBERG
8/13/2013	MR WAN	Doug ERICKSON	13323 SE SHERMAN STREET, PORTLAND, OR 97233	Doug ERICKSON
8/13/2013	MR WAN	Doug ERICKSON	13323 SE SHERMAN STREET, PORTLAND, OR 97233	Doug ERICKSON

69-117. On the dates listed below defendants **LANDON BRITT** and **BRANDON LYONS**, conducted Western Union wire transfers of funds to Chinese chemical companies for the purchase of controlled substances anabolic steroids in the following transactions:

Date	Sender	Recipient	Recipient Location	Amount
07/03/2006	LANDON BRITT	YAN WANG	CHANGZHOU, CHINA	\$ 970.00
10/07/2006	LANDON BRITT	HAITANG LI	CHANGZHOU, CHINA	\$ 1,070.00
10/23/2006	LANDON BRITT	HAITANG LI	SUZHOU, CHINA	\$ 1,065.00
01/22/2007	LANDON BRITT	CHUN ZHANG	CHANGZHOU, CHINA	\$ 1,455.00
02/06/2007	LANDON BRITT	JIANNAN WANG	CHANGZHOU, CHINA	\$ 2,250.00

02/07/2007	LANDON BRITT	LINGEN LOU	YIWU, CHINA	\$ 2,080.00
03/29/2007	LANDON BRITT	TIANHUA ZHANG	VHANGZHO, CHINA	\$ 2,400.00
07/26/2007	LANDON BRITT	PRNGFEI SHI	YIWU, CHINA	\$ 900.00
08/10/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 600.00
08/26/2007	LANDON BRITT	JIAXING HE	YIWU, CHINA	\$ 1,700.00
09/01/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 1,950.00
09/05/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 1,420.00
09/11/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 1,950.00
09/22/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 2,900.00
10/03/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 2,600.00
10/18/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 2,600.00
10/23/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 1,450.00
11/02/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 2,900.00
11/13/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 2,700.00
11/13/2007	BRANDON LYONS	ZHEN SHEN		\$ 2,500.00
11/25/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 2,600.00
11/28/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 2,600.00
12/01/2007	LANDON BRITT	ZHEN SHEN	SHANGHAI, CHINA	\$ 3,900.00
04/02/2008	LANDON BRITT	LOU YING	YIWU, CHINA	\$ 4,000.00
09/16/2009	LANDON BRITT	BO LIU	SHANGHAI, CHINA	\$ 365.00
10/06/2009	LANDON BRITT	LINGFANG HU	GANZHOU, CHINA	\$ 1,760.00
10/17/2009	LANDON BRITT	MEIYING FU	HUICHANG, CHINA	\$ 1,010.00
11/06/2009	LANDON BRITT	XUHUI LI	JIAXING, CHINA	\$ 400.00
11/10/2010	LANDON BRITT	LEI BA	CHANGCHUN, CHINA	\$ 1,550.00



01/08/2011	LANDON BRITT	DENGHONG PAN	YIWU, CHINA	\$ 1,350.00
01/20/2011	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 699.00
02/21/2011	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 1,299.00
04/04/2011	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,250.00
05/27/2011	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 1,894.00
09/28/2011	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 1,599.00
11/14/2011	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 1,394.00
02/08/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,645.00
02/24/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 1,995.00
04/06/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,300.00
04/10/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,500.00
04/22/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,900.00
04/24/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,300.00
05/05/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,699.00
05/10/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,300.00
05/15/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,820.00
05/21/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,300.00
05/26/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,500.00
06/10/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,610.00
06/16/2012	LANDON BRITT	XINGJI LIU	YIWU, CHINA	\$ 2,800.00
			Total Sent by BRITT:	\$ 96,299.00
			Total Sent by LYONS:	\$ 2,500.00

118-179. On the dates listed below defendants **LANDON BRITT** conducted bank swift transfers of funds from **LANDON BRITT's** Chase Bank account to Chinese chemical

companies, with **LANDON BRITT**, 12523 SE Harold Street, Portland, Oregon, listed as the  
**Indictment**



transferor, for the purchase of controlled substances anabolic steroids in the following transactions:

5/29/2009	\$14,400	China Merchant's Bank	Dai Zhenghui
8/12/2009	\$7,200	China Merchant's Bank	Ye Renju
9/24/2009	\$3,600	China Merchant's Bank	Ye Renju
10/20/2009	\$3,600	China Merchant's Bank	Ye Renju
11/4/2009	\$3,600	China Merchant's Bank	Ye Renju
11/16/2009	\$2,140	Hong Kong and Shanghai Banking Corporation	Wan International Limited
12/7/2009	\$2,150	Hong Kong and Shanghai Banking Corporation	Wan International Limited
12/11/2009	\$1,300	Hong Kong and Shanghai Banking Corporation	Wan International Limited
1/5/2010	\$3,600	China Merchant's Bank	Ye Renju
1/19/2010	\$2,150	Hong Kong and Shanghai Banking Corporation	Wan International Limited
1/25/2010	\$7,200	China Merchant's Bank	Shen Zhen
2/5/2010	\$3,120	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
2/9/2010	\$7,200	China Merchant's Bank	Dai Deling
2/22/2010	\$1,700	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
3/2/2010	\$1,315	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
3/22/2010	\$1,860	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
4/13/2010	\$3,600	China Merchant's Bank	Dai Zhengui
4/16/2010	\$3,250	Hong Kong and Shanghai Banking Corporation	Wan International Limited
10/26/2010	\$7,200	China Merchant's Bank	Dai Deling
11/4/2010	\$7,200	China Merchant's Bank	Dai Deling
11/9/2010	\$5,500	Hong Kong and Shanghai Banking Corporation	Wan International

			Limited
1/10/2011	\$6,000	China Merchant's Bank	Ye Renju
2/11/2011	\$4,620	Hong Kong and Shanghai Banking Corporation	Wan International Limited
3/17/2011	\$1,690	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
7/11/2011	\$4,050	Hong Kong and Shanghai Banking Corporation	Wan International Limited
8/12/2011	\$10,000	China Merchant's Bank	Chen Daichuan
8/26/2011	\$3,100	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
9/13/2011	\$2,300	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
9/26/2011	\$5,900	Foreign Cur Bus Acct Bk 1 Columbus OH	Wan International Limited
10/4/2011	\$10,000	China Merchant's Bank	Chen Daichuan
11/9/2011	\$10,000	China Merchant's Bank	Chen Daichuan
12/14/2011	\$10,000	China Merchant's Bank	Ye Renju
1-31-2012	\$11,625	China Merchant's Bank	Dai Deling
1-31-2012	\$11,625	China Merchant's Bank	Ye Renju
2-27-2012	\$2,720	Hong Kong and Shanghai Banking Corporation	Wan International Limited
3-22-2012	\$10,000	China Merchant's Bank	Chen Daichuan
3-22-2012	\$10,000	China Merchant's Bank	Dai Zhengui
4-11-2012	\$4,750	Hong Kong and Shanghai Banking Corporation	Wan International Limited
4-24-2012	\$3,600	Hong Kong and Shanghai Banking Corporation	Wan International Limited
4-25-2012	\$10,000	China Merchant's Bank	Dai Zhengui
4-25-2012	\$10,000	China Merchant's Bank	Chen Daichuan
5-22-2012	\$2,950	Hong Kong and Shanghai Banking Corporation	Wan International Limited
6-21-2012	\$5,900	Hong Kong and Shanghai Banking Corporation	Wan International

			Limited
6-27-2012	\$10,000	China Merchant's Bank	Ye Renju
6-27-2012	\$10,000	China Merchant's Bank	Chen Daichuan
7-26-2012	\$1,600	Hong Kong and Shanghai Banking Corporation	Wan International Limited
8-16-2012	\$10,000	China Merchant's Bank	Dai Zhenghui
9-19-2012	\$10,000	Bank of Communications, Shanghai, China	Benro International Co.
10-03-2012	\$3,900	Hong Kong and Shanghai Banking Corporation	Wan International Limited
10-30-2012	\$10,000	China Merchant's Bank	Ye Renju
11-2-2012	\$5,900	Hong Kong and Shanghai Banking Corporation	Wan International Limited
11-15-2012	\$2,800	Hong Kong and Shanghai Banking Corporation	Wan International Limited
11-15-2012	\$10,000	Bank of Communications, Shanghai, China	Benro International Co.
1-7-2013	\$10,000	Bank of Communications, Shanghai, China	Benro International Co.
1-10-2013	\$3,950	Hong Kong and Shanghai Banking Corporation	Wan International Limited
1-29-2013	\$10,000	Bank of Communications, Shanghai, China	Benro International Co.
1-29-2013	\$2,060	Hong Kong and Shanghai Banking Corporation	Wan International Limited
2-19-2013	\$10,000	China Merchant's Bank	Ye Renju
2-27-2013	\$5,950	Hong Kong and Shanghai Banking Corporation	Wan International Limited
3-8-2013	\$10,000	China Merchant's Bank	Chen Daichuan
Total Sent by <b>LONDON BRITT:</b>		\$369,875.00	

180-253. On the dates listed below defendants **SHANE JACK** and **LONDON BRITT**, used the U.S. Postal Service to mail packages containing controlled substances anabolic steroids, and in doing so used false names and addresses as sender information, in the following transactions (unindicted co-conspirators have not been identified and their street addresses removed):

<b>Date</b>	<b>Sender</b>	<b>Recipient</b>	<b>Type of Package</b>
2/21/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97233	J.C., Las Vegas, NV 89119	Med Flat Rate
2/25/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97234	S.R., Kennewick, WA 99336	Med Flat Rate
3/25/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97235	S. R., Kennewick, WA 99337	Small Flat Rate
3/25/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97236	T.S., Everett, WA 98208	Small Flat Rate
3/25/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97237	C.G., Clovis, CA 93619	Small Flat Rate
3/25/2013	EXM, 9702 SE Ogden, PDX, OR 97088	C.J., Miami, OK 74354	Small Flat Rate
3/26/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97238	G.V, Barnet, TX 78611	Small Flat Rate
3/26/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97239	Q.B., Seattle, WA 98144	Med Flat Rate
3/26/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97240	R.G., Las Vegas, NV 89119	Med Flat Rate
4/4/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97241	B.H., Kennewick, WA 99335	Small Flat Rate



4/9/2013	EXM, 9702 SE Ogden, PDX, OR 97086	D.H., Simi Valley, CA 93063	Small Flat Rate
4/10/2013	EXM, 9702 SE Ogden, PDX, OR 97087	C.D., Lincoln, NE 68521	Envelope
4/11/2013	EXM, 9702 SE Ogden, PDX, OR 97089	F.C., Lewiston, ID 83501	Small Flat Rate
4/11/2013	EXM, 9702 SE Ogden, PDX, OR 97090	Ali Shanghaghi, 3028 B SW Avalon Way, Seattle, WA 98126	Med Flat Rate
4/11/2013	Brian Smith, 1808 SE 182nd Ave., Portland, OR 97242	J.B., Seattle, WA 98144	Med Flat Rate
4/15/2013	EXM, 9702 SE Ogden, PDX, OR 97088	Keith Kofoed, 9015 Louise Ave, Charlotte, NC 28204	Small Flat Rate
4/15/2013	EXM, 9702 SE Ogden, PDX, OR 97089	E.P., Idaho Falls, ID	Small Flat Rate
4/15/2013	EXM, 9702 SE Ogden, PDX, OR 97090	B.K., Grants Pass, OR 97526	Small Flat Rate
4/17/2013	EXM, 9702 SE Ogden, PDX, OR 97091	C.J., Miami, OK 74354	Small Flat Rate
4/17/2013	EXM, 9702 SE Ogden, PDX, OR 97092	E.F., West Jordan, UT 84088	Small Flat Rate
4/17/2013	EXM, 9702 SE Ogden, PDX, OR 97093	J. Hollibaugh, 20002 E. Buckeye Ave, Otis Orchards, WA 99027	Small Flat Rate
4/17/2013	EXM, 9702 SE Ogden, PDX, OR 97094	E.P., Idaho Falls, ID	Small Flat Rate
5/9/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	S.L., Palmdale, Ca 93552	Small Flat Rate
5/9/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	J.K., West Sacramento, Ca 95691	Small Flat Rate
5/9/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	E.F., West Jordan, UT 84088	Small Flat Rate



5/9/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	Ben Luck, 15086 Oak Creek Rd, El Cajon, Ca 92021	Small Flat Rate
5/9/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	E.P., Idaho Falls, ID 83404	Small Flat Rate
5/9/2013	EXM, 9702 SE Ogden, PDX, OR 97086	Ali Shaghaghi, 3028 B SW Avalon Way, Seattle, WA 98126	Small Flat Rate
5/13/2013	EXM 9702 SE Ogden, Portland, OR 97086	Ali Shaghaghi, 3028 SW Avalon Way #B, Seattle, WA 98126	Med Flat Rate
5/13/2013	EXM 9702 SE Ogden, Portland, OR 97086	S.R., Kennewick, WA 99336	Med Flat Rate
5/20/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	S.P., Costa Mesa, CA 92627	Med Flat Rate
5/21/2013	EXM 9702 SE Ogden, Portland, OR 97086	R.A., Jacksonville, FL 32225	Small Flat Rate
5/21/2013	EXM 9702 SE Ogden, Portland, OR 97086	J.V., Seattle, WA 98126	Med Flat Rate
5/21/2013	EXM 9702 SE Ogden, Portland, OR 97086	C.G., CA 93619	Med Flat Rate
5/21/2013	EXM 9702 SE Ogden, Portland, OR 97086	E.L., WA 98126	Med Flat Rate
5/21/2013	EXM 9702 SE Ogden, Portland, OR 97086	T.S., WA 98208	Med Flat Rate
5/23/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	P.A., AZ 72034	Small Flat Rate
5/23/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	E.F., UT 84088	Small Flat Rate
5/23/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	E.P., ID 83404	Small Flat Rate
5/23/2013	Extrem Motorsports, 12732 SE Holt Dr, PDX, OR 97266	S.C., Carlsbad, CA 92010	Small Flat Rate
6/4/2013	EXM 9702 SE Ogden, Portland, OR 97086	J.B., Seattle, WA 98144	Med Flat Rate

6/12/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	J. Hollibaugh, 20002 E. Buckeye Ave, Otis Orchards, WA 99027	Small Flat Rate
6/12/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	J.H., Waimanalo, HI 96795	Med Flat Rate
6/19/2013	EXM 9702 SE Ogden, Portland, OR 97086	J.B., Astoria, NY 11102	Small Flat Rate
6/19/2013	EXM 9702 SE Ogden, Portland, OR 97086	T.S., Everett, WA 98208	Med Flat Rate
6/19/2013	EXM 9702 SE Ogden, Portland, OR 97086	C.B., Lagrange, IL 60525	Med Flat Rate
6/19/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	G.L., Anchorage, AK 99507	Small Flat Rate
6/19/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	J.G., Chicago, IL 60605	Small Flat Rate
6/21/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	FCM, Battle Ground, WA 98604	Small Flat Rate
6/21/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	D.H., Simi Valley, CA 93063	Small Flat Rate
6/21/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	E.F., Ritzville, WA 99169	Small Flat Rate
6/21/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	N.B., Wasilla, AK 99629	Small Flat Rate
6/21/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	G.L., Anchorage, AK 99507	Small Flat Rate
6/25/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	D.H., Simi Valley, CA 93063	Express Envelope
6/25/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	G.L., Anchorage, AK 99507	Express Envelope
6/25/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	E.P., Idaho Falls, ID 83402	Small Flat Rate
7/3/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	M6 Motel, Room 245, Mr. McCubbin, 550 Montrose Court, El Cajon, CA 92020	Express Envelope
7/3/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	T.F., Ritzville, WA 99169	Small Flat Rate
7/25/2013	EXM, 9702 SE Ogden, Portland, OR 97086	Ali Shaghaghi, 3028 B SW Avalon Way, Seattle, WA 98126	Med Flat Rate

8/7/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	S.C., Carlsbad, CA 92010	Med Flat Rate
8/7/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	M.M., Scottsdale, AZ 85251	Med Flat Rate
8/7/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	Keith Kofoed, 510 Louise Ave, Charlotte, NC 28204	Express Envelope
8/20/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	J.M., Fairbanks, AK 99701	Small Flat Rate
8/20/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	S.L., Palmdale, Ca 93552	Small Flat Rate
8/20/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	R.N, Cataldo, ID 83810	Small Flat Rate
8/20/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	E.P., Idaho Falls, ID 83402	Small Flat Rate
8/20/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	F.C., Lewiston, ID 83501	Med Flat Rate
8/20/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	R.B., Dothan, AL 36303	Small Flat Rate
8/20/2013	EXM, 12732 SE Holt Dr, PDX, OR 97266	J. Hollibaugh, 20002 E. Buckeye Ave, Otis Orchards, WA 99027	Small Flat Rate
8/29/2013	EXM, 12732 SE Holt Rd, PDX, OR 97266	C.W., Spokane, WA 99208	Small Flat Rate
8/29/2013	EXM, 12732 SE Holt Rd, PDX, OR 97266	Keith Kofoed, 510 Louise Ave, Charlotte, NC 28204	Express Envelope
9/12/2013	EXM, 9702 SE Ogden St, Portland, OR 97086	K.T., CA 90266	Small Flat Rate
9/12/2013	EXM, 9702 SE Ogden St, Portland, OR 97086	A.R., Las Vegas, NV 89139	Small Flat Rate

254. On dates including September 18, 2013, to the date of this indictment, defendants **SHANE JACK, LANDON BRITT, GEORGIA JACK, BRANDON LYONS, JAMES LONGORIA, JR., MATTHEW BOWEN, CHRISTOPHER BOWDEN, REBECCA ERICKSON, TRAVIS MONTEITH, GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK, and KEITH KOFOED** used

telephones to communicate by either voice, text message or both, details of their drug trafficking activity.

255. On or about January 20, 2013, defendant **RONALD STOLTENBERG** in Vancouver, Washington, was the intended recipient and addressee of a package from China that was found by U.S. Customs and Border Protection to contain over 7000 tablets of anabolic steroids.

256. On February 21, 2013, defendant **RONALD STOLTENBERG** received a package from China containing anabolic steroids and communicated with defendant **LANDON BRITT**. Shipping records reflect that defendant **STOLTENBERG** received 36 similar packages from Chinese chemical companies between March 14, 2008, and May 8, 2013.

257. On March 25, 2013, defendant **LANDON BRITT** mailed a USPS package containing 11 glass vials of anabolic steroids to S.R. in Kennewick, Washington.

258. On April 15, 2013, defendant **SHANE JACK** mailed a USPS package containing anabolic steroids to defendant **KEITH KOFOED** in Charlotte, North Carolina.

259. On April 24, 2013, defendant **RONALD STOLTENBERG** received a FedEx delivered package of anabolic steroids from China and communicated with defendant **LANDON BRITT**, who drove to **STOLTENBERG**'s Vancouver, Washington residence, and took the package to the drug trafficking organization's (DTO) manufacturing site, Apartment 106, Building L of the Altamont Summit Luxury Apartments, 9701 SE Johnson Creek Boulevard, Happy Valley, Oregon (Apt. L106). Later that day, defendant **LANDON BRITT** discarded the remnants of that anabolic steroids package in the dumpster immediately outside Apt. L106.

260. On April 28, 2013, defendant **LANDON BRITT** travelled from Apt. L106, the DTO's manufacturing site, to deliver anabolic steroids to an apartment occupied and used by



defendant **BRANDON LYONS**, at 11470 SE Sunnyside Road, Apartment 22, Clackamas, Oregon, immediately after **BRITT** had telephone contact with **LYONS**. **BRITT** made similar trips to deliver anabolic steroids to **LYONS**' at his apartment, with surrounding telephonic communication, on April 29, May 2, May 14, May 23, June 3, June 7, July 17, July 22, August 5, August 6 and September 11, 2013.

261. On or about September 11, 2013, defendant **MATTHEW BOWEN** was the intended recipient and addressee, in Tualatin, Oregon, for a package, from a Chinese chemical company, found by U.S. Customs and Border Protection to contain 2 kilograms of anabolic steroid powders.

262. On September 12, 2013, defendant **DOUG ERICKSON** was the intended recipient and addressee, in Portland, Oregon, of a package, from a Chinese chemical company, found by U.S. Customs and Border Protection to contain 2 kilograms of anabolic steroid powders.

263. On September 19, 2013, defendants **SHANE JACK** and **MATTHEW BOWEN** used telephones to discuss the distribution of oxycodone and hydrocodone, and prices, to and for customers of **JACK** and **BOWEN**.

264. On September 22, 2013, defendants **SHANE JACK** and **GEORGIA JACK** used telephones to discuss the manufacturing of anabolic steroids by defendant **GEORGIA JACK** at the drug trafficking organization's manufacturing site, Apartment 106, Building L of the Altamont Summit Luxury Apartments, 9701 SE Johnson Creek Boulevard, Happy Valley, Oregon (Apt. L106), and the acquisition of anabolic steroids at Apt. L106 by defendant **SHANE JACK** for distribution to a local customer.



265. On September 24, 2013, defendants **LANDON BRITT** and **JAMES LONGORIA, JR.** used telephones to discuss the marijuana manufacturing operation they established at a property owned by defendant **BRITT** in Selma, Oregon.

266. On September 25, 2013, defendants **SHANE JACK** and **GEORGIA JACK** used telephones to discuss the various anabolic steroids they had available for distribution and discussed the possibility of defendant **LANDON BRITT** mislabeling anabolic steroids which had been distributed to customers of defendant **SHANE JACK**.

267. On September 25, 2013, defendants **LANDON BRITT** and **JAMES LONGORIA, JR.** used telephones to discuss the manufacturing of marijuana at the residence of defendant **LANDON BRITT**. **LONGORIA** informed **BRITT** that he was on his way to **BRITT**'s residence. **BRITT**'s, **SHANE JACK**'s and **LONGORIA**'s vehicles were at **BRITT**'s residence for most of the afternoon and evening while defendants **BRITT**, **SHANE JACK** and **LONGORIA** processed marijuana plants for distribution.

268. On September 28, 2013, defendants **SHANE JACK** and **REBECCA ERICKSON** used telephones to communicate about two packages from China containing anabolic steroids that **REBECCA** and **DOUG ERICKSON** had received and that **REBECCA ERICKSON** intended to deliver to **SHANE JACK** that day. Later that day, defendants **REBECCA ERICKSON** and **SHANE JACK** communicated about how **REBECCA ERICKSON** is customarily paid \$100 per package, and **REBECCA ERICKSON** delivered the packages to **SHANE JACK**'s residence at 8116 SE Duke Street, Portland, Oregon.

269. On October 3, 2013, defendant **SHANE JACK** and S.H., **SHANE JACK**'s daughter, used telephones to discuss the distribution of approximately one pound of marijuana **SHANE JACK** had distributed and mailed to S.H. in Idaho Falls, Idaho.

270. October 8, 2013, defendants **LANDON BRITT** and **REBECCA ERICKSON** used telephones to discuss the attempted importation of two kilograms of anabolic steroids, sent to defendant **DOUG ERICKSON**, which were seized by U.S. Customs and Border Protection on September 12, 2013. Defendant **REBECCA ERICKSON** reported to **BRITT** getting a seizure notice and **BRITT** instructed her to shred it.

271. On October 16, 2013, defendants **SHANE JACK** and **MATTHEW BOWEN** used telephones to discuss the attempted importation of anabolic steroids and a letter from U.S. Customs and Border Protection that provided a notice of seizure to defendant **MATTHEW BOWEN** for anabolic steroids entering the United States from China on September 11, 2013.

272. On October 19, 2013, defendants **SHANE JACK** and **ALI SHAGHAGHI** used telephones to send text messages discussing the receipt of a package from defendant **SHANE JACK**, the distribution of anabolic steroids to a customer of **SHAGHAGHI**, and the payment for anabolic steroids by defendant **SHAGHAGHI** into **SHANE JACK**'s bank account.

273. On October 20, 2013, defendants **LANDON BRITT** and **TRAVIS MONTIETH** used telephones to send text messages regarding the distribution of five thousand tablets of anabolic steroids ordered by defendant **LANDON BRITT**.

274. On October 20, 2013, defendants **LANDON BRITT** and **CHRISTOPHER BOWDEN** used telephones to send text messages discussing **BRITT**'s distribution of anabolic steroids to **BOWDEN** the following day.

275. On October 21, 2013, defendant **LANDON BRITT** and **CHRISTOPHER BOWDEN** used telephones to exchange text messages to confirm the payment amount for the anabolic steroids, which **BRITT** delivered to **BOWDEN** immediately thereafter.

276. On October 21, 2013, defendants **SHANE JACK** and **BENJAMIN LUCK** used telephones to send text messages discussing the distribution of anabolic steroids to a customer of **LUCK's**, the deposit of funds into **SHANE JACK's** account as payment for anabolic steroids, and the confirmation that **SHANE JACK** mailed anabolic steroids to **LUCK's** customer.

277. On October 21, 2013, defendants **SHANE JACK** and **BRADLEY HOLLIBAUGH** used telephones to send text messages discussing the distribution of anabolic steroids to **HOLLIBAUGH** and two of his customers. Defendant **BRADLEY HOLLIBAUGH** confirmed with **SHANE JACK** that he deposited money into **SHANE JACK's** account as payment for the anabolic steroids.

278. On October 21, 2013, defendants **SHANE JACK** and **KEITH KOFOED** used telephones to send text messages discussing the distribution of anabolic steroids to **KOFOED** to his mailbox. **KOFOED** confirmed with **SHANE JACK** that he deposited money for **SHANE JACK** and **SHANE JACK** confirmed he would mail the anabolic steroids that day.

279. On October 22, 2013, defendants **SHANE JACK** and **GERMAN MARTIN MCCUBBIN** used telephones to send text messages discussing the distribution of oxycodone from **MCCUBBIN** to **SHANE JACK**. Defendant **SHANE JACK** confirmed that he would deposit money for the oxycodone to **MCCUBBIN** the following day.

280. On October 22, 2013, defendants **SHANE JACK** and **GERMAN MARTIN MCCUBBIN** used telephones to send text messages discussing the distribution of anabolic steroids by **SHANE JACK** to **MCCUBBIN's** customer located in Fort Lauderdale, Florida. Defendant **MCCUBBIN** confirmed with **SHANE JACK** that he was getting money from the customer. Defendant **SHANE JACK** informed **MCCUBBIN** that he was mailing the anabolic steroids.

281. On October 28, 2013, defendant **TRAVIS MONTIETH** transported a large quantity of anabolic steroids in his vehicle, with intention to deliver them to defendant **LANDON BRITT**, and was stopped by Portland Police Bureau officers who seized the large quantity of anabolic steroids. Defendants **TRAVIS MONTIETH** and **LANDON BRITT** subsequently used telephones to discuss the seizure of those anabolic steroids that were intended for **BRITT**.

282. On November 1, 2013, defendants **LANDON BRITT** and **JAMES LONGORIA, JR.** used telephones to discuss their drying of processed marijuana at the property owned by defendant **BRITT** in Selma, Oregon.

283. On November 4, 2013, defendants **LANDON BRITT** and **BRANDON LYONS** used telephones to send text messages discussing the distribution of anabolic steroids to **LYONS** and payment for the anabolic steroids to **BRITT**, who delivered a package to **LYONS'** residence, 11470 SE Sunnyside Road, Apartment 22, Clackamas, Oregon, shortly after the text messages concluded.

284. On November 3 and 4, 2013, defendants **LANDON BRITT** and **JAMES LONGORIA, JR.** used telephones to send text messages discussing the distribution of anabolic steroids to **LONGORIA** and payment for the anabolic steroids to **BRITT**.

All in violation of Title 21, United States Code, Section 846.

**COUNT 2**  
**[CARRYING OR USING A FIREARM DURING THE COMMISSION OF A  
 DRUG TRAFFICKING CRIME]**

On or between January 1, 2013, and the date of this Indictment, in the District of Oregon, **SHANE JACK** and **LANDON BRITT** used, carried, or possessed a firearm during and in relation to a drug trafficking crime, as alleged in count one, to wit: conspiracy to import,

**Indictment** **Page 32**



manufacture, distribute or possess with intent to distribute a controlled substance (marijuana, anabolic steroids, oxycodone and hydrocodone), in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT 3**  
**[INTERNATIONAL MONEY LAUNDERING CONSPIRACY]**

1. The grand jury re-alleges each and every allegation contained in the Introduction and in all the paragraphs in Count 1 of this Indictment and incorporates them by reference, with special reference to overt acts 1-179, as if fully set forth herein.

2. From in or about July 2006, and continuing until the date of this Indictment, in the District of Oregon and elsewhere, defendants **LANDON BRITT, BRANDON LYONS, SHANE JACK** and **GEORGIA JACK**, did knowingly and unlawfully combine, conspire, confederate and agree with each other and with others known and unknown to the grand jury, to knowingly transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, to wit: the importation, manufacture, distribution and possession with intent to distribute controlled substances anabolic steroids set forth in Count 1 of this Indictment more fully described above.

All in violation of Title 18, United States Code, Sections 1956 (a)(2)(A) and (h).

**FORFEITURE ALLEGATIONS**

1. The allegations of Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to Title 21, United States Code, Section 853.



Upon conviction of Count 1 of this Indictment, **SHANE JACK, LANDON BRITT, GEORGIA JACK, BRANDON LYONS, RONALD STOLTENBERG, JAMES LONGORIA, JR., MATTHEW BOWEN, CHRISTOPHER BOWDEN, DOUG ERICKSON, REBECCA ERICKSON, TRAVIS MONTEITH, GERMAN MARTIN MCCUBBIN, BRADLEY HOLLIBAUGH, ALI SHAGHAGHI, BENJAMIN LUCK and KEITH KOFOED** shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation, including but not limited to:

- a) That sum of money representing the amount of proceeds obtained as a result of the drug conspiracy, in the form of a money judgment.
- b) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 168 and 180 Warren Road, Selma, Josephine County, Oregon, more particularly described as:

Real property in the County of Josephine, State of Oregon, described as follows:

**PARCEL I:**

BEGINNING AT THE SOUTHEAST CORNER OF THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER OF SECTION 15, TOWNSHIP 38 SOUTH, RANGE 8 WEST OF THE WILLAMETTE MERIDIAN, JOSEPHINE COUNTY, OREGON; THENCE WEST, ALONG THE SOUTH LINE THEREOF, 356 FEET; THENCE NORTH, PARALLEL TO THE EAST LINE OF SAID NORTHEAST QUARTER OF THE NORTHWEST QUARTER 342. FEET; THENCE EAST, PARALLEL TO THE SOUTH LINE OF SAID NORTHEAST QUARTER OF THE NORTHWEST QUARTER 356 FEET TO THE EAST LINE THEREOF; THENCE EAST, PARALLEL TO THE SOUTH LINE OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION, 735 FEET; THEN SOUTH 35° EAST 430 FEET, MORE OR LESS, TO A POINT THAT IS 15 FEET SOUTH OF THE NORTH LINE OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION; THENCE WEST, PARALLEL TO SAID NORTH LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, 980 FEET, MORE OR

LESS, TO THE WEST LINE THEREOF; THENCE NORTH, ALONG SAID LINE, 15 FEET TO THE POINT OF BEGINNING.

ALSO A 25 FOOT STRIP OF LAND THAT LIES WESTERLY OF AND 25 FEET DISTANT FROM THE FOLLOWING DESCRIBED LINE, TO-WIT: COMMENCING AT THE SOUTHWEST CORNER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 15; THENCE NORTH, ALONG THE WEST LINE THEREOF, 342 FEET; THENCE EAST, PARALLEL TO THE SOUTH LINE OF SAID NORTHWEST QUARTER OF THE NORTHEAST QUARTER, 735 FEET; THENCE SOUTH 35° EAST 430 FEET, MORE OR LESS, TO A POINT THAT IS 15 FEET SOUTH OF THE NORTH LINE OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 15 FOR THE TRUE POINT OF BEGINNING OF SAID LINE; THENCE SOUTHEASTERLY, IN A STRAIGHT LINE, 700 FEET, MORE OR LESS, TO A POINT ON THE CENTER LINE OF WARREN ROAD, SAID POINT BEING 105 FEET SOUTHWESTERLY OF THE EAST LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, WHEN MEASURED ALONG SAID CENTER LINE, FOR THE TERMINUS OF SAID LINE. THE WESTERLY LINE OF SAID 25 FOOT STRIP TO BE LENGTHENED OR SHORTENED TO INTERSECT THE NORTHWESTERLY LINE OF WARREN ROAD AND AT A POINT 15 FEET SOUTH OF THE NORTH LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, LESS AND EXCEPT ANY PORTION LYING WITHIN WARREN ROAD.

**PARCEL II:**

COMMENCING AT THE SOUTHWEST CORNER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 15, TOWNSHIP 38 SOUTH, RANGE 8 WEST OF THE WILLAMETTE MERIDIAN, JOSEPHINE COUNTY, OREGON; THENCE EAST, ALONG THE SOUTH LINE THEREOF, 638.0 FEET, MORE OR LESS, TO THE CENTER LINE OF WARREN ROAD; THENCE NORTHEASTERLY, ALONG SAID CENTERLINE 780 FEET TO THE TRUE POINT OF BEGINNING; THENCE NORTHWESTERLY IN A STRAIGHT LINE 1332.0 FEET, MORE OR LESS, TO A POINT ON THE WEST LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, SAID POINT BEING 1225.0 FEET NORTH OF THE SOUTHWEST CORNER OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THENCE NORTH, ALONG SAID WEST LINE, 99.26 FEET TO A POINT THAT IS 15 FEET SOUTH OF THE NORTHWEST CORNER OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THENCE EAST, PARALLEL TO THE NORTH LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, 980 FEET; MORE OR LESS, TO A POINT (SAID POINT BEING DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTHWEST CORNER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION; THENCE NORTH, ALONG THE WEST LINE THEREOF, 342 FEET; THENCE EAST, PARALLEL TO THE SOUTH LINE OF SAID NORTHWEST QUARTER OF THE NORTHEAST QUARTER, 735

FEET; THENCE SOUTH 35° EAST, 430 FEET, MORE OR LESS, TO A POINT THAT IS 15 FEET SOUTH OF THE NORTH LINE OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION); THENCE SOUTHEASTERLY IN A STRAIGHT LINE, 700 FEET, MORE OR LESS, TO A POINT ON THE CENTERLINE OF WARREN ROAD, SAID POINT BEING 105 FEET SOUTHWESTERLY OF THE EAST LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, WHEN MEASURED ALONG SAID CENTERLINE; THENCE SOUTHWESTERLY, ALONG SAID CENTERLINE 140.0 FEET, MORE OR LESS, TO THE TRUE POINT OF BEGINNING. EXCEPTING THEREFROM: THAT PORTION LYING WITHIN WARREN ROAD. ALSO EXCEPTING THEREFROM: THAT PORTION OF A 25 FOOT STRIP OF LAND THAT LIES WESTERLY OF AND 25 FEET DISTANT FROM THE FOLLOWING DESCRIBED LINE, TO-WIT: COMMENCING AT THE SOUTHWEST CORNER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 15; THENCE NORTH, ALONG THE WEST LINE THEREOF, 342 FEET; THENCE EAST, PARALLEL TO THE SOUTH LINE OF SAID NORTHWEST QUARTER OF THE NORTHEAST QUARTER, 735 FEET; THENCE SOUTH 35° EAST 430 FEET, MORE OR LESS, TO A POINT THAT IS 15 FEET SOUTH OF THE NORTH LINE OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 15 FOR THE TRUE POINT OF BEGINNING OF SAID LINE; THENCE SOUTHEASTERLY IN A STRAIGHT LINE 700 FEET, MORE OR LESS, TO A POINT ON THE CENTERLINE OF WARREN ROAD, SAID POINT BEING 105 FEET SOUTHWESTERLY OF THE EAST LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER, WHEN MEASURED ALONG SAID CENTERLINE, FOR THE TERMINUS OF SAID LINE, THE WESTERLY LINE OF SAID 25 FOOT STRIP TO BE LENGTHENED OR SHORTENED TO INTERSECT THE NORTHWESTERLY LINE OF WARREN ROAD AND AT A POINT 15 FEET SOUTH OF THE NORTH LINE OF SAID SOUTHWEST QUARTER OF THE NORTHEAST QUARTER.

NOTE: This legal description was created prior to January 01, 2008.

2. Upon conviction of one or more of the offenses alleged in Count 2 of this Indictment, defendants **SHANE JACK** and **LANDON BRITT** shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the commission of the offense.

3. The allegations of Count 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to Title 18, United States Code, Section 982.

Upon conviction of Count 3 of this Indictment, defendants **LONDON BRITT**, **BRANDON LYONS**, **SHANE JACK** and **GEORGIA JACK**, shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the money laundering conspiracy and all property traceable to such property, including but not limited to the following:

That sum of money representing the amount of property involved in the offense, in the form of a money judgment.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without

difficulty; it is the intent of the United States, pursuant to Title 18, United States Code,

////

////

////

////

////

////

////

////

**Indictment**

**Page 37**



Section 982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.


Dated this 07 day of November 2013.

A TRUE BILL.

~~OFFICIATING FOREPERSON,~~

Presented by:

S. AMANDA MARSHALL  
United States Attorney  
District of Oregon

A handwritten signature in black ink, appearing to read 'Thomas H. Edmonds', is written over a horizontal line.

THOMAS H. EDMONDS, OSB #90255  
GEOFFREY A. BARROW  
Assistant United States Attorneys